

REMARKS

Claims 1-32 are pending and under consideration. Reconsideration is requested.

Items 3-11: Rejection of claims 10, 11, 16, 17, 20, 24, 28, and 32 under 35 U.S.C. §103

The Examiner rejects claims 10, 11, 16, 17, 20, 24, 28, and 32 under 35 U.S.C. §103(a) as being unpatentable in view of US 2003/0204618, Foster et al ("Foster") and WO 99/14931, Dalton et al. ("Dalton"). (See, Office Action at pages 2-11).

The rejections are traversed. Applicant submits that the rejection is in error since all of the features recited by at least each of independent claims 10, 16, 20, 24, 28, and 32 are not taught by an *arguendo* combination of Foster and Dalton, as the Examiner asserts.

For example, independent claim 10 recites a method including "... the packet control device including . . . each of the virtual interfaces having address information that is associated with one of the network interfaces of the packet forwarder ...". Each of independent claims 16, 20, 24, 28 and 32 have a similar recitation.

The Examiner relies on Foster's disclosure of a virtual identifier translation table reflecting the IP ports related to the virtual interfaces of the VPN on page 5, paragraph [0029] as teaching this feature. (See, Office Action at page 2, lines 20-22).

Applicants submit that the Examiner's interpretation is in error. By contrast, Foster merely teaches:

Each IFM may maintain a virtual identifier table for each of its ports that maps virtual identifiers to its destinations ports. When a frame is received at a source port, the IFM then uses the virtual identifier for that frame and the virtual identifier table for the source port. . . a virtual identifier identifies a path between devices, rather than identifying a source or a destination device.

(See, for example, [0029]).

That is, Foster merely teaches each IFM may maintain a virtual translation table for each of its ports that maps virtual identifiers to its destination ports.

Accordingly, Foster does not teach "each of the virtual interfaces having address information that is associated with one of the network interfaces of the packet forwarder," as recited by claim 10, for example.

Nothing in Dalton overcomes the deficiencies in the teaching of Foster.

Thus, an *arguendo* combination of Foster and Dalton does not teach all of the features recited by at least each of independent claims 10, 16, 20, 24, 28, and 32.

Thus, the rejection is in error and should be withdrawn and independent claims 10, 16, 20, 24, 28 and 32 allowed.

* * *

Dependent claims 11 and 17 inherit the patentable recitations of their respective base claims 10 and 16 and therefore, patentably distinguish over the cited art for at least the reason discussed above.

Thus, the rejection is in error and should be withdrawn and claims 11 and 17 allowed.

* * *

Items 12- 27: Rejection of claims 1-8, 12-14, 18, and 19 under 35 U.S.C. §103(a)

In item 12 of the Office Action, the Examiner rejects "claims 1-7, 12, 13, 18, and 19" under 35 U.S.C. §103(a) as being unpatentable over US 6 496 935, Fink et al. ("Fink") and Dalton. (See, Office Action at page 11, lines 11-12).

But, in items 13-27 of the Office Action, the Examiner also relies on the teaching of Foster in support of the rejection of each of independent claims 1, 2, 4, 6, 8, 12, 14 and 18. (See, for example rejection of claim 1 in Office Action at pages 12-13).

Accordingly, Applicants submit that item 12 should be corrected to reflect that the Examiner rejects claims 1-8, 12-14, 18, and 19 under 35 U.S.C. §103(a) as being unpatentable over a combination of Fink, Dalton, and Foster.

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The rejections are traversed. Applicant submits that the rejections are in error since all of the features recited by at least each of independent claims 1, 2, 4, 6, 8, 12, 14 and 18 are not taught by an *arguendo* combination of Fink, Dalton, and Foster as the Examiner asserts.

For example, independent claim 1 recites a packet control system including "... the packet control device includes: a virtual interface that has address information associated with the network interface of the packet forwarder ...". Each of independent claims 2, 4, 6, 8, 12, 14 and 18 have a similar recitation.

The Examiner relies on Foster's disclosure of a virtual identifier translation table reflecting the IP ports related to the virtual interfaces of the VPN on page 5, paragraph [0029] as teaching this feature. (See, for example, Office Action at page 12, line 18 - page 13, line 2).

Applicants submit that the Examiner's interpretation is in error. By contrast, Foster merely teaches:

Each IFM may maintain a virtual identifier table for each of its ports that maps

virtual identifiers to its destinations ports. When a frame is received at a source port, the IFM then uses the virtual identifier for that frame and the virtual identifier table for the source port. . . a virtual identifier identifies a path between devices, rather than identifying a source or a destination device.

(See, for example, [0029]).

That is, Foster merely teaches each IFM may maintain a virtual translation table for each of its ports that maps virtual identifiers to its destination ports.

Accordingly, Foster does not teach a "packet control device includes: a virtual interface that has address information associated with the network interface of the packet forwarder," as recited by claim 1, for example.

Nothing in the teachings of Fink or Dalton overcome the deficiencies in the teaching of Foster.

Thus, an *arguendo* combination of Fink, Dalton, and Foster does not teach all of the features recited by at least each of independent claims 1, 2, 4, 6, 8, 12, 14 and 18.

Thus, the rejection is in error and should be withdrawn and independent claims 1, 2, 4, 6, 8, 12, 14 and 18 allowed.

* * *

Dependent claims 3, 5, 7, 9, 13, 15 and 19 inherit the patentable recitations of their respective base claims 1, 2, 4, 6, 8, 12, 14 and 18 and therefore, patentably distinguish over the cited art for at least the reason discussed above.

Thus, the rejection is in error and should be withdrawn and claims 3, 5, 7, 9, 13, 15 and 19 allowed.

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Items 28- 37: Rejection of claims 21-23, 25-27, and 29-31 under 35 U.S.C. §103(a)

In items 28-37 of the Office Action, the Examiner rejects claims 21-23, 25-27, and 29-31 under 35 U.S.C. 103(a) as being unpatentable over Foster, Dalton and further in view of US 6,272 522, Lin et al. ("Lin"). The rejections are traversed. (See, Office Action at page 32 -46).

The rejections are traversed. Applicant submits that the rejection is in error since all of the features recited by at least each of independent claims 23, 27 and 31 are not taught by an *arguendo* combination of Foster, Dalton and Lin as the Examiner asserts.

For example, independent claim 23 recites a router control system which includes a forwarder and a router control device, wherein the router control device includes " a virtual

interface setting unit that that creates and manages virtual interfaces on a router control device according to corresponding network interfaces of a forwarder, each of the virtual interfaces having address information that is associated with one of the network interfaces of the forwarder . . ." Each of independent claims 27 and 31 have a similar recitation.

The Examiner relies on Foster's disclosure of a virtual identifier translation table reflecting the IP ports related to the virtual interfaces of the VPN on page 5, paragraph [0029] as teaching this feature. (See, for example, Office Action at page 35, line 19 - page 36, line 6).

Applicants submit that the Examiner's interpretation is in error. By contrast, Foster merely teaches:

Each IFM may maintain a virtual identifier table for each of its ports that maps virtual identifiers to its destinations ports. When a frame is received at a source port, the IFM then uses the virtual identifier for that frame and the virtual identifier table for the source port. . . a virtual identifier identifies a path between devices, rather than identifying a source or a destination device.

(See, for example, [0029]).

That is, Foster merely teaches each IFM may maintain a virtual translation table for each of its ports that maps virtual identifiers to its destination ports.

Accordingly, Foster does not teach "a virtual interface setting unit that that creates and manages virtual interfaces on a router control device according to corresponding network interfaces of a forwarder, each of the virtual interfaces having address information that is associated with one of the network interfaces of the forwarder, " as recited by claim 23, for example.

Nothing in the teaching of Dalton or Lin overcomes the deficiencies in the teaching of Foster.

Thus, an *arguendo* combination of Foster, Dalton, and Lin does not teach all of the features recited by at least independent claims 23, 27, and 31. Thus, the rejection is in error and should be withdrawn and independent claims 23, 27, and 31 allowed.

* * *

Dependent claims 21-22, 25-26, and 29-30 inherit the patentable recitations of their respective base claims and therefore, patentably distinguish over the cited art for at least the reason discussed above.

Thus, the rejections are in error and should be withdrawn and claims 21-22, 25-26 and 29-30 allowed.

Correction of Record Requested.

Applicant respectfully point out that WO 99/14931 cited by the Office Action is not listed on the PTO 892 attached to the Office Action.

In response to the telephone inquiry from the Applicants representative, the Examiner asserts there is no requirement to separately list WO 99/14931 on a PTO 892 since WO 99/14931 was listed in the Form PTO-1449 filed with the IDS on February 20, 2004 and the listing, initialed by the Examiner as being considered and attached to the previous Office Action mailed December 13, 2007.

Applicants submit that as set forth in MPEP 707.05 entitled "Citation of References":

Copies of references cited by applicant in accordance with MPEP § 609, §707.05(b) and § 708.02 are *not* furnished to applicant with the Office action. . . . The examiner should check the left hand column of form PTO-892 if a copy of the reference is not to be furnished to the applicant.

Thus, Applicants submit that the PTO-892 should have correctly indicated that WO 99/14931 as being cited by the current Office Action with the left hand column of the PTO-892 checked to indicate that a copy of WO 99/14931 is not being furnished with the Office Action.

Applicants request correction of the record to reflect the same.

Conclusion

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,
STAAS & HALSEY LLP

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By: Paul W. Bobowiec
Paul W. Bobowiec
Registration No. 47,431

1201 New York Avenue, N.W., 7th Floor
Washington, D.C. 20005
Telephone: (202) 434-1500
Facsimile: (202) 434-1501